

COOLEY LLP

TRAVIS LEBLANC (251097)
(tleblanc@cooley.com)
KRISTINE A. FORDERER (278745)
(kforderer@cooley.com)
ANUPAM DHILLON (324746)
(ADhillon@cooley.com)
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111
Telephone: +1 415 693 2000
Facsimile: +1 415 693 2222

TIANA DEMAS (*pro hac vice* forthcoming)
(tdemas@cooley.com)
110 N. Wacker Drive, Suite 4200
Chicago, IL 60606-1511
Telephone: +1 312-881-6500
Facsimile: +1 312-881-6598

URVASHI MALHOTRA (334466)
(umalhotra@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304
Telephone: +1 650 843 5000
Facsimile: +1 650 849 7400

Attorneys for Defendant
GOOGLE LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHRISTOPHER BARULICH,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

THE HOME DEPOT, INC., a Delaware
corporation, and GOOGLE LLC, a
Delaware limited liability company,

Defendants.

Case No. 2:24-cv-01253

**DECLARATION OF KRISTINE
FORDERER IN SUPPORT OF JOINT
STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY MORE THAN 30 DAYS (L.R. 8.3)**

Complaint Served: February 23, 2024
Current Deadline: March 14, 2024
New Response Date: May 13, 2024

1 I, Kristine Forderer, declare as follows:

2 1. I am an attorney at the law firm of Cooley LLP and an attorney of record
3 for Google LLC (“Google”) in the above-captioned matter. I am licensed to practice
4 law in the state of California and am admitted to practice before this Court. I submit
5 this declaration in support of the Joint Stipulation to Extend Time to Respond to the
6 Initial Complaint By More Than 30 Days (L.R. 8.3) (“Stipulation”) in compliance
7 with this Court’s standing order, and make this declaration based on my personal
8 knowledge.

9 2. On February 14, 2024, Plaintiff filed a class action complaint
10 (“Complaint”) in this action against Google and Home Depot, Inc. (“Home Depot”).
11 ECF No. 1. Google was served with the summons on February 22, 2024. ECF No.
12 15.

13 3. Google recently retained Cooley as counsel in this action.

14 4. Soon after being retained, Cooley reached out to counsel for Plaintiff to
15 request a 60-day extension, to which they agreed. Cooley then drafted the Stipulation,
16 coordinated with counsel for Home Depot to incorporate their feedback, and obtained
17 assent to file the Stipulation from counsel for Plaintiff.

18 5. The requested extension is necessary so that Google and its counsel can
19 fully assess the claims and defenses at issue, continue investigating the facts
20 surrounding Plaintiff’s allegations, identify the governing contractual agreements,
21 and explore consolidation of this case with a similar case filed in the Northern District
22 of California on October 23, 2023, pending before the Honorable Rita F. Lin,
23 captioned *Ambriz v. Google LLC*, No. 23-cv-05437. The requested extension also
24 would provide Home Depot sufficient time to locate any records of Plaintiff’s alleged
25 calls to Home Depot. The requested 60-day extension is for same the amount of time
26 Google would have had to respond to the Complaint had Plaintiff sought a waiver of
27 service (which Google would have agreed to).

28

6. Upon being served, Google diligently began its factual investigation, assessment of the claims, coordination with Home Depot, and exploration of consolidation. However, Google cannot complete these steps by March 14, the current deadline to respond to the Complaint. The 60-day extension is designed to allow sufficient time to complete these steps.

7. No previous extensions by either party have been sought in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2024 in San Francisco, California.

By: /s/ Kristine A. Forderer
Kristine Forderer (278745)